

CHAPTER 6

PUBLIC PARTICIPATION TASKS & TECHNIQUES

Section 1

COMMUNITY ASSESSMENT PROCESS

OVERVIEW

The community assessment process allows DTSC to consider potential community interest and informational needs at a hazardous waste facility or a site early in the technical process. Community assessment also helps DTSC to anticipate the nature of possible community concerns and inquiries, and respond appropriately to those inquiries.

There are several types of community assessment, which can be performed, depending upon what is already known about the community's level of interest, the significance of the site or permit action being proposed, and staff resources available. These include:

- o **Community Profile** - Required during Preliminary Environmental Assessment process, (thumbnail sketch of community, newspaper articles), and provided by the Responsible Party.
- o **Baseline Community Survey** - Required prior to commencement of remedial investigation to corrective action and closure projects. Evaluate potential interest in a project. Also done for facility permits.
- o **Community Interviews** - Required prior to commencement of Remedial Investigation/Feasibility Study field work. Required for "high" community interest removal actions, facility permits, and RCRA Facility Investigation (RFIs).
- o **RAPID Informal Assessment** - Used to informally and quickly determine the impacted community and its concerns during and after an accidental release of hazardous materials or waste.

The decision on what type of assessment is appropriate in a given situation is to be made by the PPS assigned to the project using the following guidelines.

Evaluating Level of Community Interest

The first step in the community assessment process is to do a rough evaluation of potential community interest at a given site/facility. To judge the level of community interest

at a site/facility, project staff should review the following:

- o Review DTSC files and records of public inquiries about the site or facility.
- o Review DTSC public participation file, if one already exists. If not, this is the time to create a PP file.

COMMUNITY PROFILE - Overview / Responsibility / Timing

A community profile is a report submitted to DTSC by a proponent/applicant under the Fee-For-Service or Voluntary Cleanup programs, or as part of the Preliminary Endangerment Assessment (PEA) process. The profile is used to obtain a "thumbnail sketch" of a community. This is necessary to evaluate whether public involvement activities are warranted at a given time and to identify sites or facilities with "high" community interest or concern early in the process. Refer to Exhibit #, Community Profile Outline, page #.

PUBLIC PARTICIPATION TASK RESPONSIBILITIES			
ACTIVITY	PPS	***	PROJECT MANAGER
COMMUNITY PROFILE	-Review Community Profile -Make recommendations for further community assessment.	-Prepare community profile for state-lead sites.	-Request Community Profile from Fee-for-Service, Voluntary Cleanup, and PEA proponents. - Forward Community Profile to PPS.
***Activities which are not assigned to specific staff, but which must be accomplished by the PPS, Project Manager, and/or clerical support.			

Timing

Site Mitigation - The Preliminary Endangerment Guidance Manual (1994), requires that a community profile be prepared for each Preliminary Endangerment Assessment (PEA). The community profile should be submitted by the project proponent, along with their Preliminary Endangerment Assessment work plan. This profile must be reviewed by a PPS to determine what activities are warranted. Sites with "high" community interest or concern may require public participation support at this early stage.

In instances when a draft Preliminary Endangerment Assessment report is submitted to DTSC for review without prior review of the work plan, the community profile must be submitted with the draft document. In any case, the community profile must be evaluated by a PPS prior to its approval.

A community profile is also submitted to DTSC by a proponent under the Voluntary Cleanup program. This community profile is used by the PPS to help estimate the number of PPS hours that are necessary for the proposed project.

HWM - A community profile is submitted to DTSC by a proponent under the Fee-For-Service program. This community profile is used by the PPS to help estimate the number of

PPS hours necessary for the proposed project.

Draft

EXHIBIT 6-1

COMMUNITY INTEREST EVALUATION WORKSHEET

The following criteria can be used as general guidelines for evaluating whether the level of community interest is **High** or **Low** for a specific project. No single answer will necessarily determine if a project is of high interest, rather the answers should be evaluated by the PPS and project manager as a whole. This determination is useful for developing an appropriate and responsive public participation program. These are only general guidelines and cannot replace a site-specific community assessment. Also, it should be recognized that community interest may change at any point during the site mitigation or hazardous waste management process. Therefore, the project staff and PPS should continually monitor community interest.

PROJECT

TYPE	"HIGH" INTEREST CRITERIA	Yes	No
ALL	Site is close to residences, schools or businesses or other sensitive populations.		
ALL	Site may pose a risk to public health or the environment. There are obvious exposure pathways, such as ground or surface waters, dust, odors or prevailing winds, by which contaminants could reach humans or wildlife.		
ALL	Local community believes that the site may pose health risk.		
ALL	The community has demonstrated previous interest in toxics or other environmental issues.		
ALL	Local officials, citizens and other agencies are familiar with the project and have concerns.		
ALL	Site location has been the subject of a high level of public interest, as evidenced by media coverage or other community activity.		
ALL	Local communities are concerned that property values may decline because of the site.		
ALL	Local communities have a negative view of, or questions, DTSC credibility.		
ALL	There have been community inquiries, either to DTSC or other local agencies.		
ALL	There are numerous hazardous waste facilities or sites within one geographical location (e.g., city limits or particular neighborhood).		
ALL	The site may become an election issue or have political ramifications.		
HWMP	The application is for a land disposal closure or permit for retrofitting.		
HWMP	The application is for an incineration or boilers and industrial furnaces (BIF) permit. NOTE: It is the DTSC policy to classify ALL incinerator permit applications as "high" interest.		
HWMP	Permit applicant or facility has a poor reputation within the community.		
HWMP	The proposed technology (i.e., incinerator, landfill, commercial treatment & storage facility) has a negative reputation within the community.		
HWMP	The permit application is for a large, commercial treatment and storage facility.		

EXHIBIT 6-2

COMMUNITY PROFILE OUTLINE

All major headings and bullet items in Exhibit # should be addressed. Additional guidance is provided in the Exhibit in italics. Upon completion the Community Profile shall be submitted to the Department for review and approval by the PPS.

SITE/PROJECT NAME

SITE/PROJECT DESCRIPTION

- * **Description of proposed project:** *What is the nature of the project? Are there suspected or known releases of hazardous substances? What are they? What is the stage of the project; site assessment, site investigation? Is it a hazardous waste facility permitting/closure project? Describe. Is it part of a larger site or facility? Is there a schedule for completion? What are the current /past business operations at the site?*
- * **Location and size of site/project:** *Address and size of the site.*
- * **Description of surrounding land uses and environmental resources including proximity to residential housing, schools, churches, etc.** *What is the current zoning/land uses for the site and for immediate surrounding land? Are there agricultural, wetlands or other environmental resources nearby? What is the nearest residence, school, day care center and other sensitive receptors? Are there planned changes in land use?*
- * **Map:** *Provide a map of the site and immediate vicinity.*
- * **Demographics of the community in which the site is located:** *Population, socioeconomic level, ethnic composition, specific language considerations (for possible translation of information), and the local government organization (city council, county board).*

LOCAL AWARENESS AND INTEREST

- * **Does the community have any awareness of the project as a hazardous substance release or permitting facility? Have there been meetings, presentations, or other outreach efforts taken to inform the community about the site?** *Document any prior or current efforts undertaken to inform the community of the site.*

- * **Contacts by community members:** *Have there been contacts or inquiries from individuals or groups regarding the site? (Include their names, phone number, and address on the Key Contact List.)*
- * **Media coverage:** *Has there been any newspaper, magazine, or television coverage related to the site? (Include copies of articles, if available.)*
- * **Government involvement:** *Has there been or is there currently any other government involvement with the site? City or county staff, elected officials, other regulatory agencies?*

KEY CONTACT LIST

- * Provide names, addresses, and phone numbers of key local officials including city manager, city/county planning department and environmental health department contacts, other involved agency contacts, and community members with whom there has been contact on the site including any environmental or other groups which may have potential interest in the site.
- * **Provide a list of adjacent property owners and leasers/renters:** *These names provide the initial step in formation of the Department site mailing list.*

KEY ISSUES AND CONCERNS

- * **Are there any specific concerns or issues raised by the community regarding the site or operational activities conducted at the site?** *Health concerns, property value concerns, land use concerns, other.*
- * **Any anticipated concerns/issues regarding the site?** *If the community is unaware of the site, what are the anticipated concerns/issues.*
- * **Level of concern:** *Is there or is there anticipated to be low, medium, or high level of concerns? Is significant controversy expected?*
- * **Any general environmental concerns or other projects with high controversy in the community?** *Have environmental or other citizens groups shown interest in other sites or issues in the past? Which groups? What sites/issues?*
- * How does the community wish to communicate? (or have the ability to) electronically? written? meetings?

RECOMMENDED PUBLIC PARTICIPATION ACTIVITIES

- * **Recommend public participation activities beyond those required by regulation or law:** *Is some additional community assessment merited in your opinion? Is a Public Participation Plan in order? Do you anticipate the need for meetings?*

DEPARTMENT PPS APPROVAL

Signature/Date

Draft

BASELINE COMMUNITY SURVEY - Timing and Techniques

A baseline community survey (also referred to as a community survey) is a process conducted by a PPS, utilizing questionnaires, display ads and telephone interviews, from Section 25358.7 (b). It is also an opportunity to introduce a project to a community and get some early feedback. A baseline community survey cannot take the place of community interviews, which are necessary prior to the development of a Public Participation Plan.

PUBLIC PARTICIPATION TASK RESPONSIBILITIES			ACTIVITY
PPS	***	PROJECT MANAGER	BASELINE
questions.	-Print & mail survey.	-Prepare draft of Community Survey	-Develop survey
COMMUNITY	-Review & approve Community		cover letter.
SURVEY	Survey cover letter.	-Review survey comments and	make recommendations.
	-Determine scope of distribution.		
	-Evaluate & summarize the results		
	of the Community Survey.		

***Activities which are not assigned to specific staff, but which must be accomplished by the PPS, Project Manager, and/or clerical support.

Timing

Site Mitigation - A baseline community survey can be performed at the earliest stages of a project. A baseline community survey also can be a useful tool to monitor community interest during the life of a project or evaluate the impact of a change in circumstances.

HWM - Community surveys are ideal for evaluating new projects to obtain a general idea of the level of community interest. For known "high" community interest facilities, community interviews should be conducted.

Techniques

There is one primary technique to use, in whole or in part, for community surveys. This is:

Questionnaire

- o Develop project **mailing list** (refer to page # for guidance on mailing lists);
- o Send out an **introductory letter** describing the proposed project, DTSC's role, and public involvement opportunities. Include with the letter, a questionnaire asking about knowledge of, interest in, or concern about project, as well as how to best work with this community. (Refer to Exhibit #, page #, for a sample letter.); and,

- o Review responses received to obtain feedback on community interest and/or concern. Consider number of responses received (10% is usually a good response to such a mailing), as well as the specific comments provided.

A written survey can be enhanced by the following methods:

Telephone Interviews

Conduct a limited number of telephone interviews with key community leaders (usually 5-7 interviews will suffice) for additional information about community and issues. (Refer to Exhibit # page #, for examples of telephone interview questions.)

Display Ad

Place a display ad in local newspapers, describing the proposed project, DTSC's role, and public involvement opportunities. Include a DTSC contact and a tear-out coupon which can be returned for additional information and to be added to the project mailing list.

Site Visit

In addition to these primary techniques, it may be useful to conduct a drive-by site/facility inspection to gather more information about the community.

Summary

Prepare a summary of information received from questionnaires, phone interviews, and/or display ads. From this, develop a public involvement strategy, which is responsive to needs identified by the community. This should include whether additional community assessment efforts are warranted as well as any other public participation activities that are anticipated for the project.

COMMUNITY INTERVIEWS - Overview & Timing

Community interviews are individual, in-person interviews, conducted by the PPS and the Project Manager with community members, local officials, and other interested parties to:

- o Identify the interested community;
- o Obtain historical information about the site/facility;
- o Assess community issues and concerns;
- o Evaluate level of awareness about a project;

- o Obtain an understanding of past community involvement in this or other similar projects;
- o Receive input on how to best involve the community in the site mitigation or permit process; and,
- o Begin to establish a relationship with local agency and community representatives.
- o To meet the requirements, of Health and Safety Code Section 25358.7 interviews cannot take the place of a community survey, or vice versa.
- o Ability to send/receive electronic correspondence or access to the internet.

PUBLIC PARTICIPATION TASK RESPONSIBILITIES			
ACTIVITY	PPS	***	PROJECT MANAGER
COMMUNITY INTERVIEWS	-Identify need for interviews. -Identify Interview scope. -Prepare/approve questions. -Conducts interviews. -Review assessment summary/ (write for state-lead sites or permit.) -Approve the list of interviews.	-Schedule interviews.	-Suggest interview participants. -Review and make recommendations on questions -Participate in interviews. -Comment on Summary.
***Activities which are not assigned to specific staff, but which must be accomplished by the PPS, Project Manager, and/or clerical support.			

Timing

Site Mitigation - Community interviews are the first step in the development of a Public Participation Plan. An approved Public Participation Plan must be in place before Remedial Investigation field work can begin at a site. (Refer to Exhibit #, "Site Mitigation Technical Milestones and Public Participation Activities", page #.) Interviews can also be done at any time during the site mitigation process, as needed, in order to evaluate changing community make-up, interests, needs or concerns.

HWM - Community interviews should be done for any "high" community interest facilities, when review of the Part B permit application begins or when corrective action is initiated. Refer to Exhibit #, "High Community Interest Criteria", page #, for guidance on determining whether a facility is considered "high" interest. This determination may change for a facility at any time. The PPS is responsible for determining whether community interviews are necessary for a facility.

Preparing for Interviews

Community interviews are a time-intensive activity because of the large amount of organization required and time needed for interviews. While the level of effort will vary, schedule approximately four hours per interview for research and preparation, the interview itself, and follow-up activities.

Collect Background Information

Collect background information about the project and community. This information can be collected from other DTSC staff, newspaper reports, DTSC files, a drive-by site/facility inspection, other agencies, and the permit application/closure plan.

Organizations and Local Agencies

Identify contact persons at interested organizations and local agencies. In addition to establishing the community's level of interest, project staff must identify the organizations, agencies and individuals who have been interested or involved in the site or facility related activities to date. This information can be obtained by reviewing the following materials:

- o Newspaper clipping;
- o DTSC's public participation file for the site/facility; and,
- o DTSC telephone logs that record site- or facility-related public inquiries.

Establish an Interview Team

The PPS conducts the interviews with participation from the Project Manager and responsible party or site mitigation project proponent, if applicable or deemed appropriate by the PPS.

Identify Persons to Interview

Develop a list of interested parties to interview. The project team must develop a list of community members to be interviewed, including representatives of those persons and organizations identified in the two steps above. Additional efforts should be made to identify those community members who are less vocal or visible, as they will provide additional perspectives and concerns about the site/facility that may not surface during interviews with more actively involved community members. DTSC policy requires the PPS to conduct and/or participate in the interviews. Project staff should accompany the PPS.

Refer to Exhibit # "List of Individuals and Organizations to Interview", on page #.

Prepare List of Interview Questions

Develop a list of interview questions. The interview is an opportunity for community members to express their concerns about the site/facility directly to DTSC, and to have input to the public participation planning process. The questions posed during the interview should, therefore, be open-ended in order to elicit the widest range of community members' concerns and experiences regarding the site/facility. Questions should be phrased so as not to be leading or biased.

Exhibit #, on page #, contains a list of standard interview questions that may be used to guide the interview. This list is not all inclusive and project staff should develop additional questions that will elicit site/facility-specific or community-specific concerns. For example, if the community has been suspicious or distrustful of local or state government actions or decisions in the past, questions should be asked that will supply DTSC with information on those events and the community's current attitudes toward local authorities. Site/facility files will provide information with which additional interview questions can be developed.

Arrange the Interviews

- o Telephone the people you have selected to interview, explain the purpose of the interview, and arrange a convenient time and place to meet. Ideally, the meeting place should promote candid discussions. While government and business representatives are likely to prefer meeting in their offices during business hours, local residents and community groups may be available only during non-business hours. Meetings at their homes may be most convenient.
- o The interviews may take place within a single community or over a large geographical area. It is important to plan ahead when scheduling the interviews and group them by geographic location to prevent back-tracking throughout the day. Depending on the number of interviewees and their geographic locations, one or more days may be required to complete the interviews.
- o Staff should allow for up to one hour per interview, plus time to travel to the next appointment. Appointments should be scheduled two to three weeks prior to the interview to allow time to send a letter confirming the date and time, reason for the interview, and topics to be discussed.
- o Interpreter should be used when interviewing community members who speak a language other than English.

CONDUCTING THE INTERVIEWS

In conducting interviews, consider the following:

Explain Purpose

The PPS will begin the interview with a brief overview of the project, and explain that the primary goal of the interview is to obtain rather than disseminate information. The information gathered during the interview is used to assess community concerns, and to develop an appropriate public participation strategy. While DTSC staff may answer questions or provide a brief summary about DTSC activities and findings, the interview is not intended to serve as a formal briefing.

Assure Confidentiality

Explain that while the public involvement plan will be part of the project file, the plan will not attribute specific statements or information to any individual. Ask interviewees if they would like their names, addresses, and telephone numbers on the mailing list.

Identify Other Interested Parties

Ask the interviewees for names and telephone numbers of other persons who are interested in activities at the site/facility.

Determine Previous Outreach

Determine the interviewee's perception of past DTSC or site or facility public participation activities.

Identify Concerns About Site/Facility

When identifying citizens' concerns about the site or facility concerns, consider the following factors:

- o Threat to health or the environment
- o Economic concerns
- o Agency credibility
- o Community involvement
- o Media coverage (local, state, national)
- o Number of households/business affected

Future Public Involvement in Project

Explain the public involvement process, and ask the interviewees:

- o How they would like to be involved and informed of the project progress (keep a list of individuals who wish to be kept informed);
- o What is the best way to stay in contact;
- o To recommend convenient locations for holding public meetings and setting up information repositories.
- o Do they have the ability to send/receive electronic comments or access the internet?

Community Interviews Summary

Summary of community concerns should be written up at the completion of community interviews. This can be incorporated into the Public Participation Plan or, when no Public Participation Plan is required, can become the basis for a memo to file, outlining a public participation strategy for the project. (Refer to the "tone and voice" to use, page #).

EXHIBIT 6-5

LIST OF INDIVIDUALS & ORGANIZATIONS TO INTERVIEW (MUST CONTACT FOR INTERVIEW)**

** Residents located close to the site/facility
** Businesses located close to the site/facility
Local chapter of the League of Women Voters
Parent-Teachers Associations and school principals
Chamber of Commerce

Civic groups such as the Lions, Kiwanis and Rotary Clubs

** Appropriate City Council Member(s)
** City Planning Department
** County Supervisor(s)

Environmental groups such as Sierra Club, Greenpeace and Citizens for a Better Environment

University or community college leaders

** Representatives of State and local agencies such as the Regional Water Quality Control Board (RWQCB) and the Air District

** Representatives of the local Public or Environmental Health Department

** State legislators

** Federal legislators (federal legislators are only required at federal sites or RCRA facilities or NPL sites and should be considered at "high " profile state sites/facilities).

Local/Regional community or environmental groups
Sensitive receptors (e.g., Hospitals, Schools, Parks, Day Care Centers)

EXHIBIT 6-6

STANDARD COMMUNITY INTERVIEW QUESTIONS

HISTORY:

1. How long have you lived or worked in this area?
2. Are you familiar with the site/facility?
 - a. Where have you received your information about the site/facility?

- b. How and when did you first become aware of the site/facility?

CONCERNS:

- 3. Do you have any concerns about this site/facility?

- a. If so, which of these are most important?

INVOLVEMENT:

- 4. What do you know about the history of community involvement around this site/facility?

- a. Have you been actively involved with the site/facility in any way?
- b. Are you aware of any individuals or groups who have emerged as leaders on this issue?
- c. Do you feel they adequately represent your concerns?

- 5. Have you had any contact with local, state or other officials regarding this site/facility?

EXHIBIT 6-6 (cont.)

- a. If so, what was the nature of this contract?

MEDIA:

- 6. Do you feel that the media coverage has presented an accurate picture of the situation:

- 7. Have you had any personal experiences with the media?

- a. Do you feel your concerns have been accurately reflected in media coverage?

8. Do you listen to news on the radio?
9. On what TV stations do you watch the news?
10. What newspapers do you take?

LEVEL OF CONFIDENCE:

11. Do you have confidence in the State's ability to: clean up this site or appropriately process the permit application/closure plan approval for this facility?

COMMUNICATION:

12. Do you feel you have been kept adequately informed about the site/facility?
 - a. What, if any, communication problems have you experienced in the past?
 - b. If not, what other kinds of information would you like to be receiving?

EXHIBIT 6-6 (cont.)

13. What is the best way to provide you with information about the site/facility?
 - ___ Fact Sheets
 - ___ Community Meetings
 - ___ Workshops
 - ___ Advisory Committee
 - ___ Other (explain)
 - ___ Electronic messages (e-mail)
 - ___ Access to DTSC's web site

14. Can you suggest a convenient location(s) for:

a. Community Meetings

b. Local Information Repositories

15. Can you suggest anyone else we may want to talk to?

16. Any other comments, suggestions or concerns you would like to add?

Site/facility files will provide the information with which additional interview questions can be developed.
